

Cederholm, Eric

From: Damico, Genevieve
Sent: Tuesday, February 09, 2016 7:01 AM
To: Portanova, Sam; Rolfes, Sarah
Subject: FW: Title V petition search
Attachments: ConocoPhillips Order_3-15-05.pdf; Chevron I Order_3-15-05.pdf

Exemption 5Exemption 5Exemption 5Exemption 5

From: Danesh, Paymon
Sent: Monday, February 08, 2016 3:58 PM
To: Damico, Genevieve
Subject: Title V petition search

Genevieve,

I may have found the petition order(s) you were referring to (summarized below and attached). If you had a different petition in mind, let me know and I'll continue searching.

Petition Name: ConocoPhillips Company - San Francisco Refinery
Petition No. IX-2004-09
Petition Received: 12/8/2004.
Region/State: R9 / California
Order at 24-25:

"... Petitioner alleges that the District must modify the title V permit to include the requirements of 40 C.F.R. Part 63, Subpart UUU, which is the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Petroleum Refineries for Catalytic Cracking and Reforming Units and Sulfur Recovery Units. The comments contend that the District should ensure that the permit imposes and makes enforceable all applicable limits from Subpart UUU.

The compliance deadline for MACT Subpart UUU is April 11, 2005. 40 C.F.R. § 1563(b). When a permit is issued prior to the MACT compliance date, EPA believes that it is acceptable for the initial permit to describe MACT applicability at the Subpart level, and for all other compliance requirements (including compliance options and parameter ranges) of the MACT that apply below the Subpart level to be added at a later time as a significant permit modification."

A similar statement is made in the following order:

Petition Name: Chevron Products Company – Richmond Refinery

Petition No. IX-2004-08

Petition Received: 12/8/2004.

Region/State: R9 / California

Order at 38-39:

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